

# RUBIN AND RUDMAN LLP

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September 30, 2005

## BY HAND

Mary L. Cottrell  
Department Secretary  
Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: Discount Rate Participation, D.T.E. 01-106B; Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company, D.T.E. 05-55; Massachusetts Electric Company and Nantucket Electric Company, D.T.E. 05-56

Dear Secretary Cottrell:

Enclosed please find this original, accompanied by eight (8) copies of Blackstone Gas Company's ("Company") comments in support of the Department of Telecommunications and Energy's ("Department") uniform cost-recovery mechanism related to the low income discount rate, as issued for comment on September 27, 2005 by Hearing Officer Memorandum ("Memorandum").

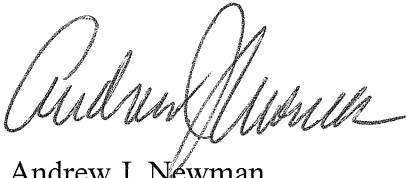
On September 16, 2005, the Department held a public hearing and technical session in the above captioned dockets to permit comment from interested persons on the establishment of an appropriate uniform cost-recovery mechanism related to the low-income discount rate. At the technical session, Department staff discussed an alternative cost-recovery mechanism. On September 27, 2005, the Department circulated the details of this mechanism to the service lost for review and comment. The Company has reviewed the alternative mechanism as presented in Section 2 of the Memorandum, finds that its terms are generally acceptable, and recommends that it be adopted. The Company agrees with the comments of Western Massachusetts Electric Company and New England Gas Company that the Department approve weather normalized sales as the correct sales to establish the baseline period.

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Thank you for your attention to this filing and for the opportunity to comment in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Andrew J. Newman". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Newman".

Andrew J. Newman  
Counsel for Blackstone Gas Company

AJN/lms

Enclosures

cc: Jeanne Voveris, Senior Counsel, D.T.E.  
Jeff Hall, Rates Analyst, D.T.E.  
Service List, D.T.E. 01-106-B